

SEP 1 1994

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In re Applications of	)	MM Docket No. 93-241
	)	
DARRELL BRYAN	)	File No. BPH-920109MA
	)	
SBH PROPERTIES, INC.	)	File No. BPH-920123MD
	)	
	)	

For Construction Permit for  
New FM Channel 276A  
Tusculum, Tennessee

To: Honorable John M. Frysiak  
Administrative Law Judge

PETITION TO REOPEN THE RECORD AND RECEIVE EVIDENCE

SBH Properties, Inc. ("SBH") by counsel herewith petitions to have the record in this proceeding reopened and to have the attached Engineering Statement of Steven J. Crowley, P.E. received into evidence as SBH Exhibit No. 17. In support whereof the following is shown:

1. Darrell Bryan's testimony indicates that he intends to utilize a microwave studio-transmitter link (STL) to transmit his programming from his Studio to his transmitter site. (Bryan Exhibit No. 8). At the July 26, 1994 hearing in this proceeding Bryan confirmed that he intended to locate his Studio for the proposed Tusculum FM station at the building which he owns and currently utilizes as the studios for WSMG(AM). (Tr. 97-98) Bryan testified that he has an existing 30 foot tower located at his proposed Studio on which he would mount the STL antenna. (Tr.

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99) However, Bryan could not state whether or not he would be able to obtain a line of sight path between his transmitter site and this 30 foot tower located at his proposed Studio, given the fact that he had never investigated the question. (Tr. 100). Likewise, Bryan's expert witness, Richard Mertz, indicated that he could not state whether or not a line of sight path could be obtained, because he was not familiar with the intervening terrain. (Tr. 154) However, Mr. Mertz did confirm that a line of sight path would be required. (Tr. 152)

2. Bryan testified that, should he be unable to obtain a line of sight path between his transmitting tower and the existing 30 foot tower at his proposed Studio, he would install an intermediate receive/transmit point at another existing tower, which he owns and currently utilizes for a shortwave repeater and which he was confident would provide a line of sight path to both his studio and his transmitter sites. (Tr. 100)

3. Thus, the current state of the record is such that there is insufficient evidence upon which to base any conclusion regarding whether a line of sight path can be obtained between Bryan's proposed transmitting tower and the 30 foot existing tower at his proposed Studio or whether it will be necessary for Bryan to implement his alternate proposal, by installing and utilizing an intermediate receive/transmit point at the existing tower he currently uses as a shortwave repeater, in order to obtain a line of sight path. The attached Exhibit provides the missing evidence and resolves this unresolved question.

4. The attached Exhibit consists of an Engineering Statement and supporting data, prepared by Steven J. Crowley, P.E., describing his analysis of and setting forth his conclusions regarding Bryan's proposed STL path. Based on his detailed analysis of the terrain between Bryan's proposed Studio and transmitter sites, Mr. Crowley concludes that a line of sight path could be obtained only if the STL antenna at the Studio site were mounted at least 134 feet above ground level, establishing that a line of sight path cannot be obtained between an STL antenna mounted immediately below a 4 bay antenna on Bryan's proposed transmitting tower and an STL antenna mounted at the top of the 30 foot existing tower at Bryan's proposed Studio site.

5. The testimony contained in the attached Exhibit could not have been prepared and offered prior to the close of the record. At his January 12, 1994 deposition, Bryan testified that he had not yet determined where he would locate his FM studios. (Depos. pp. 30-31, attached as Exhibit A) However, at the July 26, 1994 hearing in this proceeding Bryan testified unequivocally for the first time that he intended to locate his Studio for the proposed Tusculum FM station at the studio building which he owns and currently utilizes as the studios for WSMG(AM). (Tr. 97-98) This raised (for the first time) the question of whether he would require more than one transmit and one receive point for his proposed STL, given the nature of the intervening terrain between his transmitter site and his proposed Studio. As Bryan had never previously stated unequivocally that he would locate his FM

studio in the building he currently uses as the studios of WSMG(AM), SBH was not in a position to prepare and offer appropriate engineering testimony, addressing this question, at hearing. Furthermore, neither Bryan nor his expert witness, was able to resolve this question at hearing. (Tr. 100; 154) Thus, in light of these facts, SBH indicated prior to the close of the record that it intended to investigate the STL line of sight question and, if warranted, would seek to have the record reopened in order to offer engineering testimony to resolve this question. (Tr. 173-74)

6. In order to prepare and file the attached Exhibit and this Petition, it was necessary that SBH have available the transcript of the July 26, 1994 hearing in this proceeding, in order to establish the testimony of Bryan and his expert witness relating to this unresolved question of fact. While the transcript of the July 26, 1994 hearing apparently was filed on August 12, 1995, for some reason unknown to SBH it was not made available for public inspection until August 31, 1994. Counsel for SBH had had a standing order in place for delivery of a copy of the transcript, as soon as it was filed. Counsel for SBH received a copy of the transcript on September 2, 1994, just prior to the Labor Day holiday weekend. SBH has prepared and filed this Petition and the accompanying Exhibit promptly upon receipt of the transcript.

7. The reopening of the record for the limited purpose of receiving the attached Exhibit will not serve to unduly disrupt

or materially delay the resolution of this proceeding. Proposed findings are not due to be filed until September 30, 1994, allowing more than sufficient time for the incorporation by the parties of such additional findings as they may wish to include, based on the attached Exhibit. Although SBH is prepared to make Mr. Crowley available for cross examination, if requested, it does not anticipate that cross examination will be necessary or productive, given the technical nature of the Exhibit and Mr. Crowley's undisputed qualifications. The Exhibit addresses a very narrow and technical question and was prepared utilizing conservative assumptions in order to assure that it would be noncontroversial. In that regard Mr. Crowley based his analysis on the assumption that the STL antenna at the transmitter site would be located as close as reasonably possible to the bottom bay of the proposed 4 bay antenna and, thus, as high as possible on the tower, consistent with the antenna model (Shively 6813NX), center of radiation and mounting procedures specified by Mr. Mertz (Bryan Ex. 9, p. 9; Tr. 155) and by Bryan's Engineer, Mr. Lysiak (SBH Ex. 9, p.1). Likewise, even though the photographs accompanying the Technical Statement confirm their significant height, Mr. Crowley based his analysis on the very conservative height of only 50 feet for the trees on the ridge that constitutes the critical path point. Not only was his analysis based upon conservative assumptions, but the physical data underlying Mr. Crowley's analysis is extremely reliable and verifiable. The location of the studio and transmitter sites is

not subject to dispute and all of the terrain data was derived from the Chuckey and Greeneville TVA 7.5" topographic maps and is subject to ready verification. Likewise, the presence and height of the trees at the critical path point is easily observed, whether in the field or by means of the photographs.

8. Furthermore, receipt of the attached Exhibit would engender no need for further testimony. As indicated above, although unable to state whether or not a line of sight path could be obtained between his proposed transmitter site and the 30 foot existing tower at his proposed Studio, Bryan had determined and indicated at hearing precisely how he intended to address the problem, if it could not. Thus, Bryan testified that, if line of sight could not be obtained between his proposed transmitting tower and the 30 foot existing tower at his proposed Studio, he would install and utilize an intermediate receive/transmit point, which he will locate on another tower he owns and currently utilizes for a shortwave repeater. (Tr. 100) <sup>1</sup>/ Therefore, the only unresolved question, which the attached Exhibit answers, is whether a line of sight path can be obtained between Bryan's proposed transmitting tower and the 30 foot existing tower at his proposed Studio or whether it will be

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1. While Mr. Mertz suggested that it might be possible to increase the height of the existing 30' tower at Bryan's Studio site (Tr. 153), Bryan advanced no such proposal. Furthermore, the attached Exhibit establishes that a tower of sufficient height to provide a line of sight path to Bryan's transmitter site (i.e., 134') could not be guyed on the property on which Bryan's Studio is located.

necessary for Bryan to implement his alternate proposal, utilizing an intermediate receive/transmit point. Under such circumstances, acceptance of the attached Exhibit will serve the public interest by resolving a currently unresolved question in this proceeding. In the absence of the testimony contained in the attached Exhibit the question will remain unresolved and the record incomplete. More importantly, the unresolved status of this question would preclude Bryan from meeting his burden of proof in establishing his financial qualifications, either currently or at the time of filing, because it may not simply be assumed that Bryan could obtain a line of sight path for his STL without utilizing an intermediate receive/transmit point or 'hop.' Thus, the receipt of the attached exhibit will serve the public interest by assuring a complete record.

WHEREFORE, premises considered, the record should be REOPENED and the attached Exhibit should be RECEIVED and made a part of the record in this proceeding. 2/

Respectfully Submitted,

SBH PROPERTIES, INC.

By: 

Timothy K. Brady  
Its Attorney

P.O. Box 986  
Brentwood, TN 37027-0986  
(615) 371-9367

September 12, 1994

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2. Counsel for SBH has retained the original and one copy of the attached Exhibit for transmission to the Dockets Branch for inclusion with the record.

1 Q Okay. In divesting the AM station would you  
2 anticipate that whoever purchased that station, would you place  
3 any restrictions on them using, for instance, the call sign WSMG  
4 or would you intend to retain that for use on your FM station?

5 A It probably wouldn't make any difference. I  
6 probably would have new call letters for the FM.

7 Q Are you planning on transferring staff from  
8 the AM over to the FM, I mean your current employees? Would they  
9 continue to be employed by you at the FM?

10 A The ones I wanted to keep, yes.

11 Q So you would anticipate keeping some and then  
12 hiring some additional employees?

13 A If I need more employees, yes.

14 Q I don't know if you need to look at this or  
15 not, but one of the engineering exhibits, somewhere in here I  
16 believe it indicates that you're going to have your studio in  
17 the Tusculum area.

18 A Right.

19 Q Do you recall that?

20 A Yes, sir.

21 Q That's all I was looking for. And you haven't  
22 determined the location, is that right?

23 A No.

24 Q But you will not be operating the FM out of  
25 your current AM studio?



1           A           It depends on the building. If the station  
2 moves out of there then that building would be available, so it  
3 just depends on what's available at that point in time.

4           Q           Is it your intention then in disposing of the  
5 AM or divesting the AM that you would ... you own the building  
6 individually as opposed to Burley, right?

7           A           Right, I own the building.

8           Q           It, I guess, currently would be leased to  
9 Burley?

10          A           Yes.

11          Q           And so have you made a determination to keep  
12 the building or sell the building....

13          A           No.

14          Q           ...with the AM?

15          A           No.

16          Q           So if you don't sell the building....

17          A           It depends on money.

18          Q           Okay. If you don't sell the building with the  
19 AM, then you may use it for the FM?

20          A           It's possible.

21          Q           I think the transmitter site for the AM, that  
22 property is leased, is it not?

23          A           Leased, correct.

24          Q           I asked you a minute ago about whether you  
25 were going to utilize the employees you currently have for the

**ENGINEERING STATEMENT**  
**PATH ANALYSIS OF PROPOSED DARRELL BRYAN STL SYSTEM**

This engineering statement discusses the results of an analysis of the propagation path for the proposed Darrell Bryan (Bryan) Studio-Transmitter Link (STL) system. The STL is to be used with his proposed new FM facility serving Tusculum, Tennessee.

Figure 1 is a plot of critical elevation (terrain at or above 1560 feet) between the proposed Bryan Studio and the FM transmitter site. Terrain elevation was taken from the Tennessee Valley Authority's Greeneville, Tennessee, and Chuckey, Tennessee, 7.5 minute quadrangles. A photo-reduced version of these two quadrangles showing the STL path is included as Figure 2.

The coordinates of the proposed FM transmitter site were taken from the Bryan FM application (Exhibit E-4). Coordinates of the proposed Studio were taken from the Greeneville, Tennessee 7.5 minute quadrangle. The location of the proposed Studio was determined by locating Group C, Parcel No. 4 on District Map No. 99A, based on data (identifying the appropriate map, group and parcel numbers) taken from the Greene County Real Estate Appraisal Card for the Snapps Ferry Road property, owned by Darrell Bryan and currently used as the studio location for WSMG(AM) (Attachment A, hereto). As reflected in the detail of District 10 Map No. 99A, attached as Attachment B, hereto, Parcel 4 lies on the southeast corner of the intersection of Snapps Ferry Road and Sparta Street. Utilizing the information derived from District 10 Map No. 99A, it was possible to identify the location of the intersection of Snapps Ferry Boulevard and Sparta Street on the Greeneville, Tennessee 7.5 minute quadrangle as shown in Figure 3 and, thus, the precise location, coordinates and ground elevation of Bryan's proposed Studio Site. (See: detail attached as Attachment C, hereto)

The studio coordinates were determined to be 36° 10' 21" North Latitude, and 82° 48' 46" West Longitude. Studio ground elevation was determined to be 1560 feet AMSL. The FM transmitter is 17.0 kilometers, or 10.6 miles, from the studio, along a bearing of 107.0 degrees True. The path of the proposed Studio-Transmitter Link is depicted in Figure 2, attached hereto.

The assumed location of the STL receive antenna is 1947 feet above mean sea level (AMSL). This was determined by taking the proposed FM center of Radiation (599 meters, or 1965 feet), subtracting the distance from the center-of-radiation to the center of the lowest bay on a Shively 6813 series four-bay antenna system of standard design (14 feet), subtracting the distance from the center of the lowest bay to the lowest end of the same bay (one foot), and subtracting the distance from the top of a Scala PR-450U (Paraflector) antenna to its radiation center (3 feet), assuming the Scala antenna is oriented with its longest dimension vertically.

As can be seen from Figure 1, the studio STL antenna must be sufficiently high in order to provide a line-of-sight path clearing a critical path point located 0.8 miles from the studio. Ground elevation at this critical point is 1660 feet AMSL. (See: detail attached as Attachment C, hereto) Added to that is 4 feet of earth curvature correction (calculated assuming 4/3 earth's radius), and 50 feet to account for trees on the hilltop. As reflected in the attached photographs (Attachment D, hereto) taken of the ridge, which constitutes the critical path point located 0.8 mile from the proposed Studio, the ridge in question is covered with trees (Photo # 1) and the trees located on the top of the ridge (Photos # 2 & # 3) are of significant height, rendering the 50 foot height assumption added to the critical path point a conservative estimate. The elevation of the critical path point thus becomes 1714 feet AMSL. As can be seen from Figure 1, the resulting studio STL antenna center-of-radiation must be 134 feet above ground level in order to provide a line-of-sight path.

As reflected on the Real Estate Appraisal Card (Attachment A, hereto) and on the detail of District 10 Map No. 99A (Attachment B, hereto), the dimensions of Parcel 4 are approximately 70 by 155 feet. As further reflected in the attached "Guying Details for 100' - 210' 55G Towers," taken from the Rohn Commercial Products Catalogue (Attachment E, hereto), a distance of 112' from the tower base to each of the three guy anchor points would be required for a 140' tower, assuming the manufacturer's recommended guying procedures were utilized. Accordingly, it may be concluded that a tower of sufficient height to permit installation of the Studio STL antenna with a center of radiation of 134 feet above ground level could not be guyed on Parcel 4.

Assuming local zoning approval could be obtained for a 134 foot tower at this location, it might be possible to install a self-supporting tower on Parcel 4. However, as depicted in the attached photograph of the parcel in question (Attachment F), a large portion of the parcel in question contains the studio building. The "January 1, 1994 Rohn Commercial Products Dealer Price List" indicates that the "Dealer Price" for a 140 foot self-supporting tower would be \$8,705.00. (See Attachment G, hereto)

Rohn Catalogues and price lists include warnings against the installation of any tower within falling distance of power lines. (See: Attachment E, General Note 9) A 140 foot tower located on Parcel 4 would be within falling distance of power lines on both Snapps Ferry Road and Sparta Street.

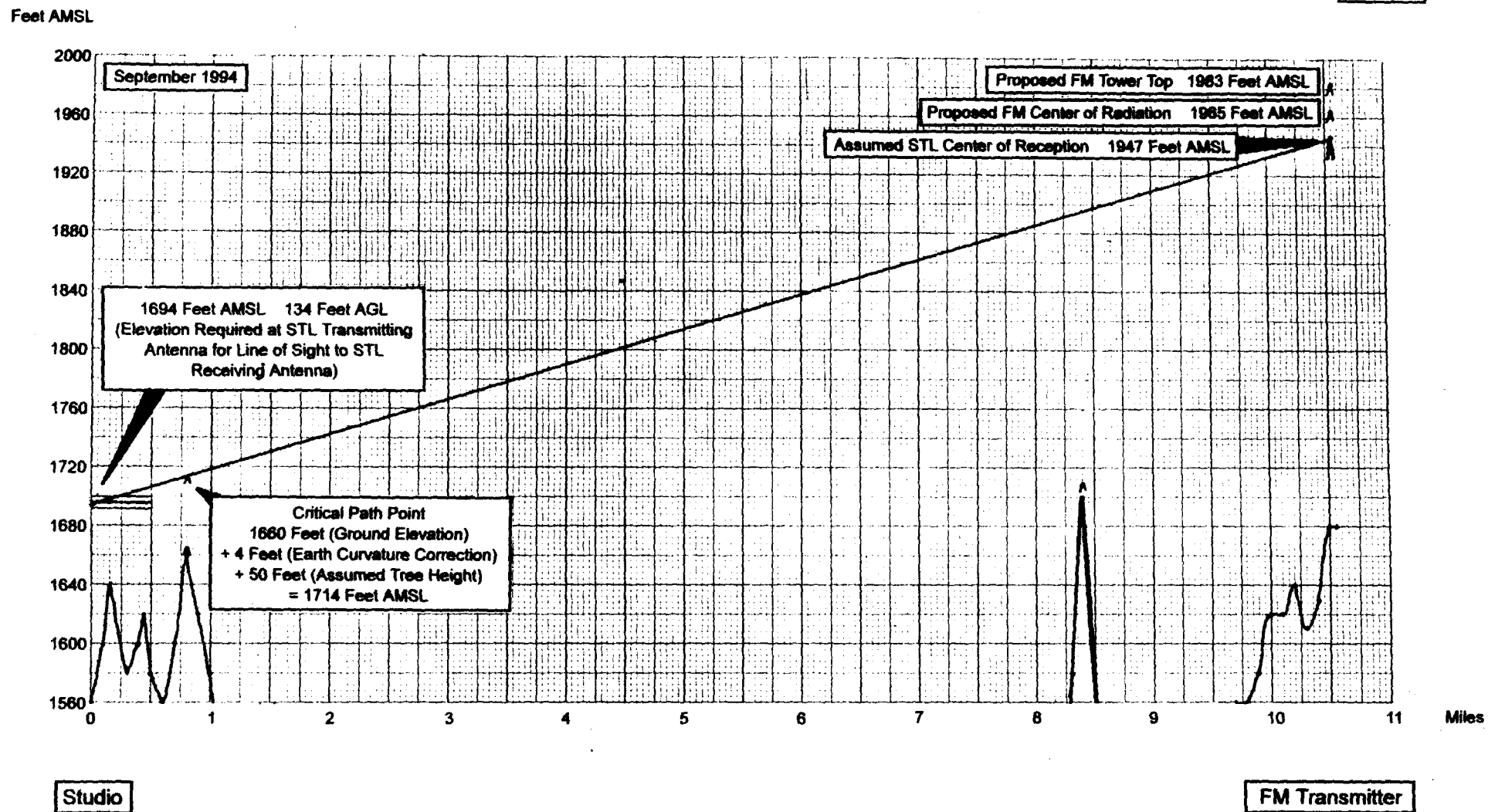
I hereby certify under penalty of perjury that the foregoing is true. Signed and dated this  
6th day of September, 1994.

A handwritten signature in black ink, appearing to read 'Steven J. Crowley', written in a cursive style.

Steven J. Crowley, P.E.  
D.C. Registration No. 8561

Steven J. Crowley, P.E.  
Consulting Engineer  
1133 15th Street, N.W. Suite 1200  
Washington, D.C. 20005  
Telephone (202) 223-1101

Figure 1



# Path Analysis of Proposed Darrell Bryan STL System (see accompanying text)

Steven J. Crowley, P.E.

Washington, D.C.

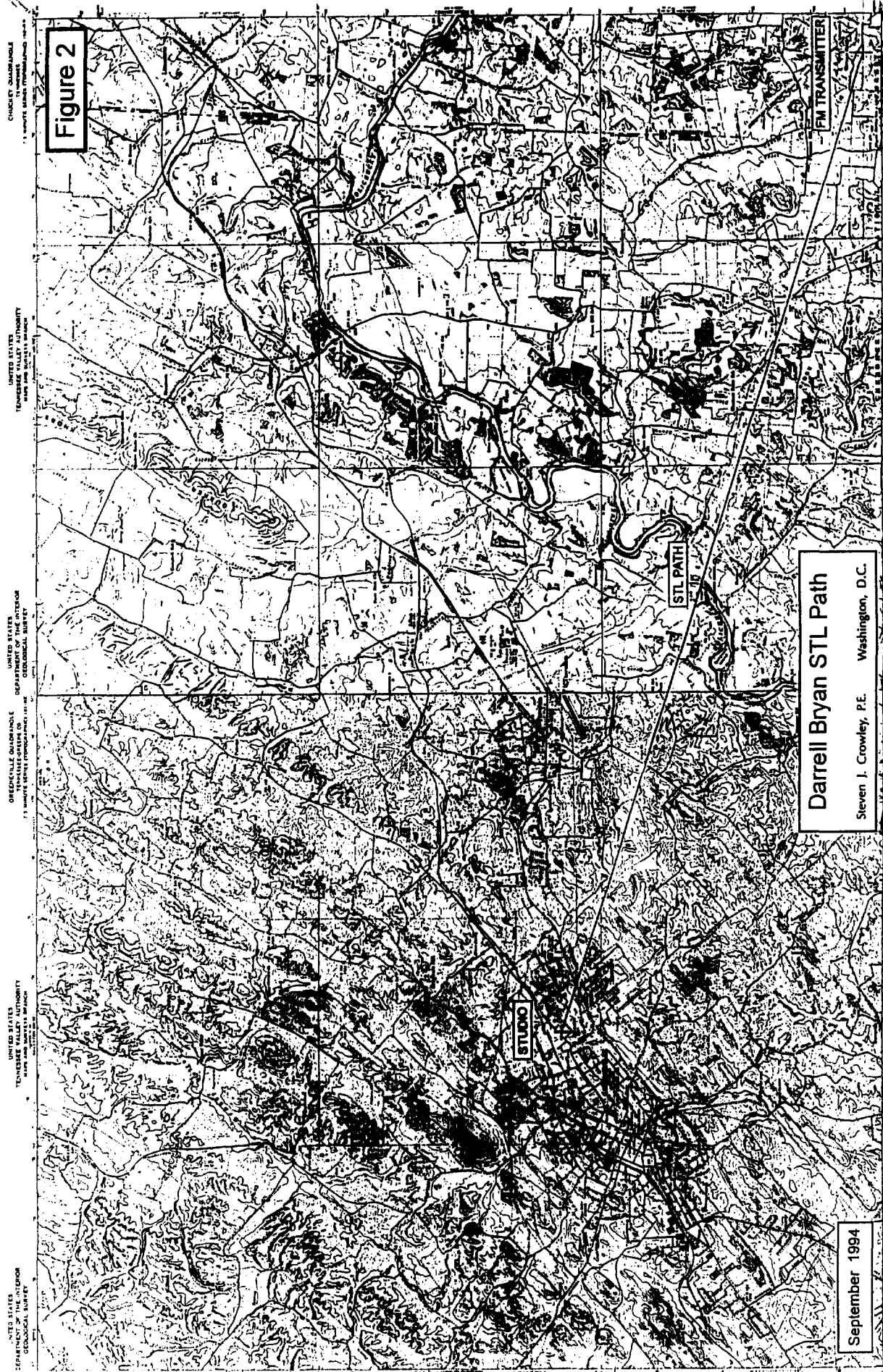


Figure 2

**Darrell Bryan STL Path**  
Steven J. Crowley, P.E.    Washington, D.C.

September 1994

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CHATTANOOGA NATIONAL MONUMENT  
CHATTANOOGA, TENNESSEE  
1:50,000 SCALE  
1994

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CHATTANOOGA NATIONAL MONUMENT  
CHATTANOOGA, TENNESSEE  
1:50,000 SCALE  
1994

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CHATTANOOGA, TENNESSEE  
1:50,000 SCALE  
1994

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CHATTANOOGA NATIONAL MONUMENT  
CHATTANOOGA, TENNESSEE  
1:50,000 SCALE  
1994

IN \*\*\* COMMERCIAL \*\*\* STATE OF TENNESSEE REAL ESTATE APPRAISAL CARD

SNAPPS PERRY M. 1992 10 0003 PG 0055 BL 0000 LT 0002 TAX YEAR 10 0000 C. 0000 0000 0000

BRYAN GARRELL M. 1992 10 0003 PG 0055 BL 0000 LT 0002 COUNTY OF GREENE GREENEVILLE 311 GREENEVILLE

NA(0)1 4 P O BOX 727 GREENEVILLE TN 37744

ADDITIONAL DESCRIPTION DIMENSIONS 70W X 155 INK 75U

TOTAL LAND UNITS 70.00 DEED .00 CALC .00

FOUNDATION CONCRETE FOOTING FLOOR SYSTEM SLAB ON GRADE EAT WALL CONCRETE BLK/BRK STRUCT FRAME WOOD JOIST/RIGID FRAME ROOF FRAMING WOOD ROOF COV-MET METAL GYPSUM CAR-MILLWORK AVERAGE FLOOR FINISH CARPET COMBINATION INTER FINISH PANELING - AVER RMS 1.10 PAINT-DECOR AVERAGE HTG/AIR COND HEAT & COOLING PKG PLUMBING NO. OF FIXTURES 8 BATH 1 ELECTRICAL AVERAGE QUALITY AVERAGE

APPROXIMATED VALUE RECORD

IMP 59300 LAND 12900 TOTAL APPR 72200 TOTAL USE 0 ASSESSMENT 28880 PROP TYPE 08 40% BASE-30\*80+30\*80

BASE 100 36.17 36.17 2400 86808

ASPH PAV 1 1.16 2400 1972 15.00 10.00 278

COMMERCIAL 10 007010195 10 0070100 92 100 280.00 184.00 70.00 12880

020808 80000 40000 010184 70000 380 012484 380 005 808 DYKES ADVERTISING

\*\*\*\*\* COST APPROACH \*\*\*\*\*

PTS	SHP	SIZ	ADJ	BASE	ADJ	IMP	YB	EYB															
121	100	102	123	29.41	36.17	30	1972	1972															
<table border="1"> <thead> <tr> <th>% OF</th> <th>ADJ</th> <th>AREA</th> <th>SQUARE</th> <th>REPL</th> </tr> <tr> <th>RATE</th> <th>RATE</th> <th>RATE</th> <th>FEET</th> <th>VALUE</th> </tr> </thead> <tbody> <tr> <td>BASE 100</td> <td>36.17</td> <td>36.17</td> <td>2400</td> <td>86808</td> </tr> </tbody> </table>									% OF	ADJ	AREA	SQUARE	REPL	RATE	RATE	RATE	FEET	VALUE	BASE 100	36.17	36.17	2400	86808
% OF	ADJ	AREA	SQUARE	REPL																			
RATE	RATE	RATE	FEET	VALUE																			
BASE 100	36.17	36.17	2400	86808																			

\*\*\*\*\* MARKET1 APPROACH \*\*\*\*\*

IMP	LAND	MARKET1	IMP	LAND
59307	72880	72187	59307	72880
CARD TOTAL		72187	PARCEL VALUE: TOTAL 72187	

REPL. VALUE NEW 86808

NORMAL DEPREC. 23% 19966

OWNER PHYS. 7% 6077

FUNCTIONAL OBSOLES. 0% 0

ECONOMIC OBSOLES. 0% 0

DEPREC. REPL. VALUE 60763

REPL. VALUE 278

COST IMPROVEMENT VALUE 61043

LAND MARKET VALUE 12880

COST CARD VALUE 73923

IMP 61043 LAND 12880 TOTAL 73923

\*\*\*\*\* CORRELATION DATA \*\*\*\*\*

RELIA	CORR	% OF
VALUE	INDEX	VALUE
72187	082	100.00
73923	082	100.00
INADEQUATE MARKET DATA		
INSUFFICIENT INCOME DATA		

\* CORRELATED VALUE 72187

\* VALUE CORRELATED AS A RESULT OF

\* GROUP-LEVEL CORRELATION % CONTROL.

\*\*\*\*\* FINAL CORRELATED PARCEL VALUE \*\*\*\*\*

IMP	59307
LAND	12880
TOTAL	72187

\*\*\*\*\*



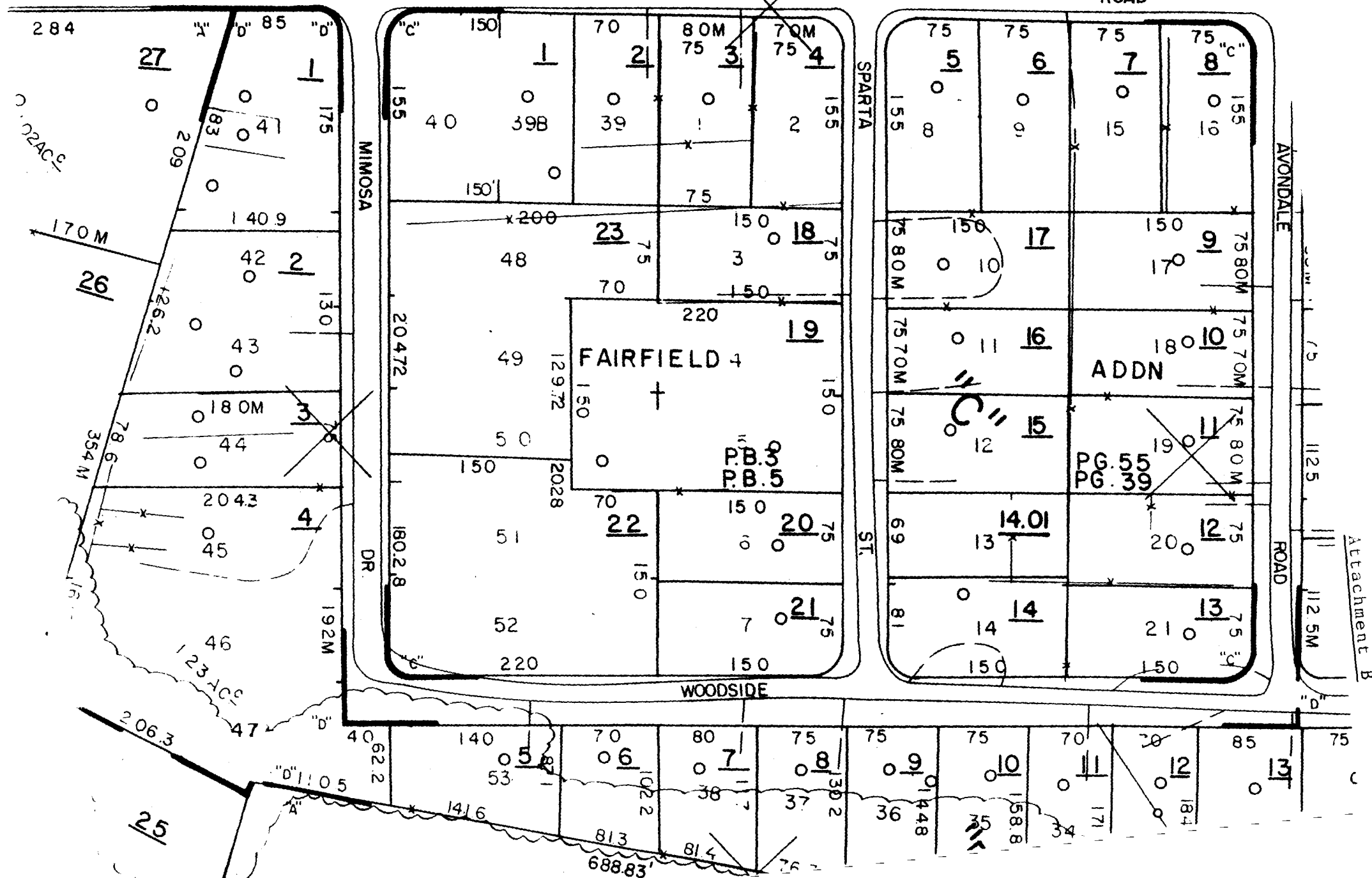
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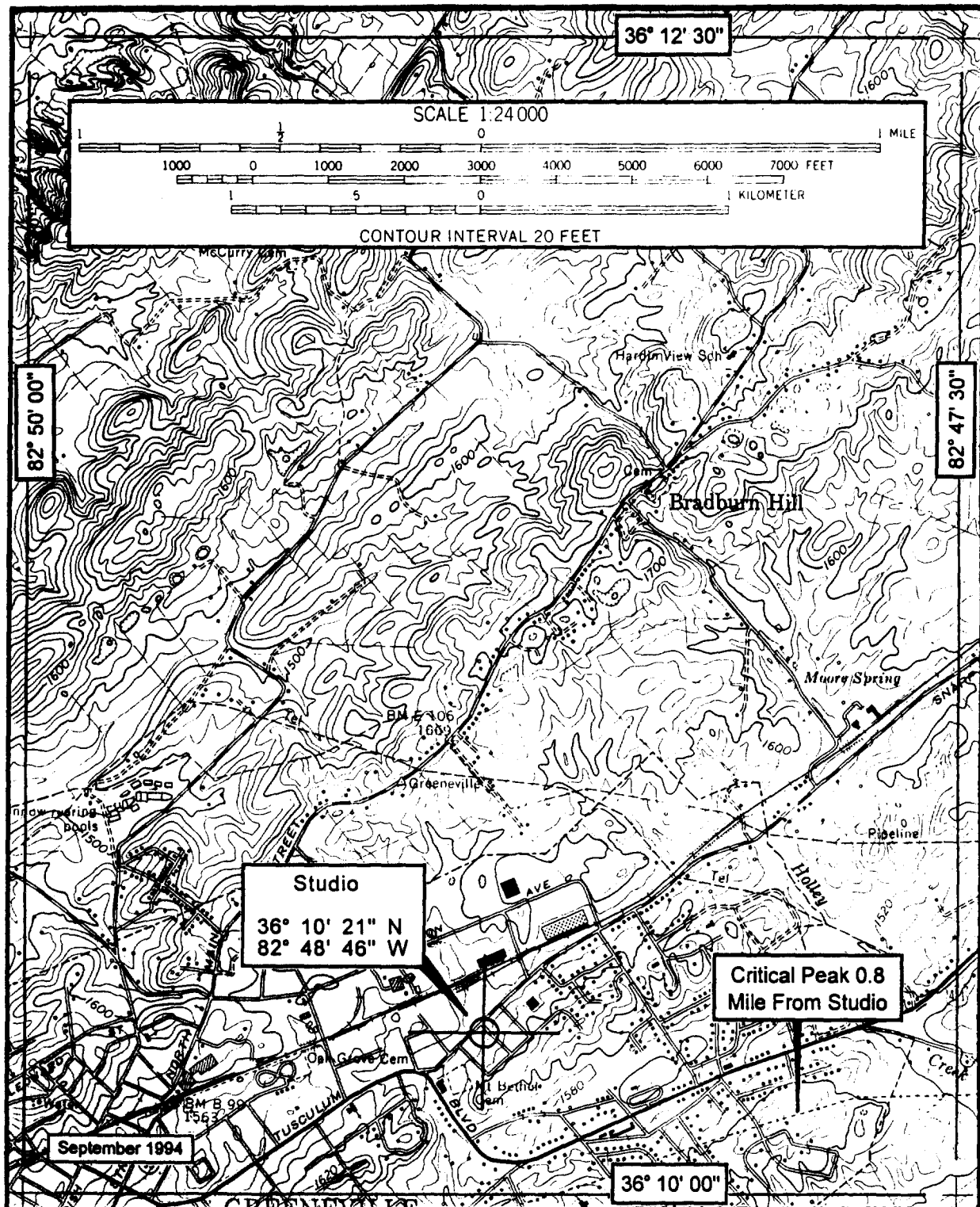
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SNAPPS

FERRY

ROAD





## Proposed Darrell Bryan Studio

Steven J. Crowley, P.E.

Washington, D.C.

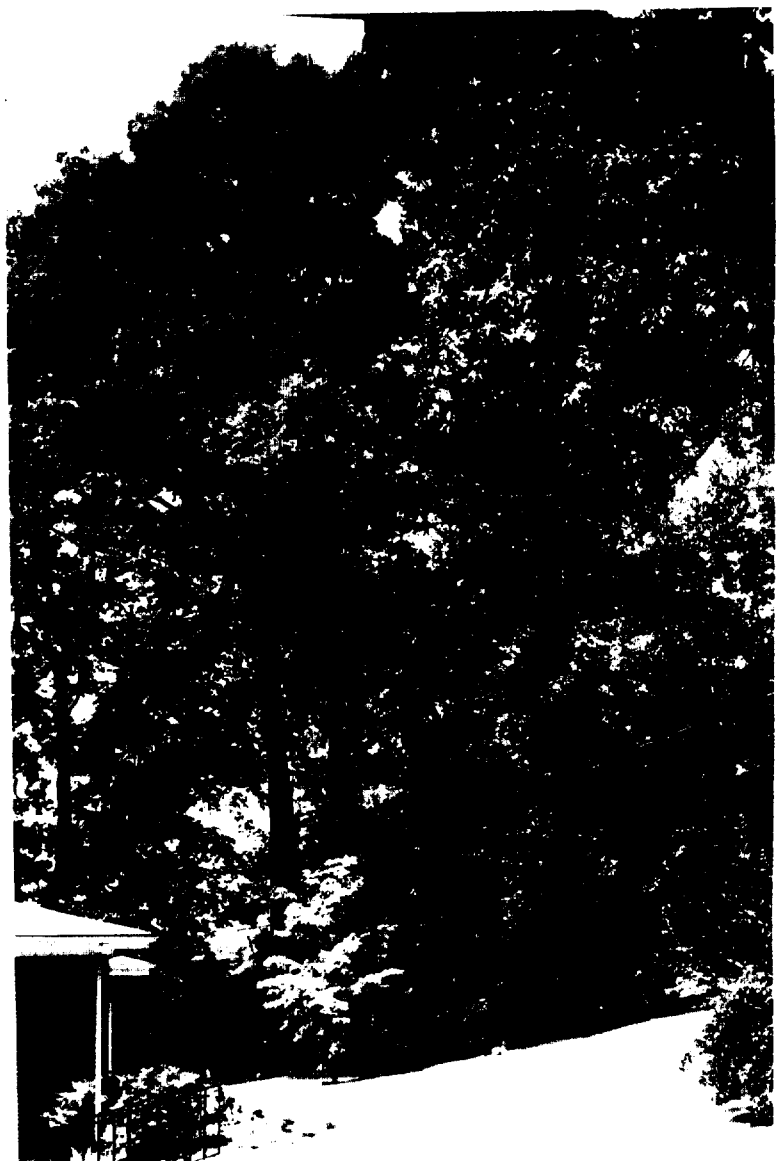
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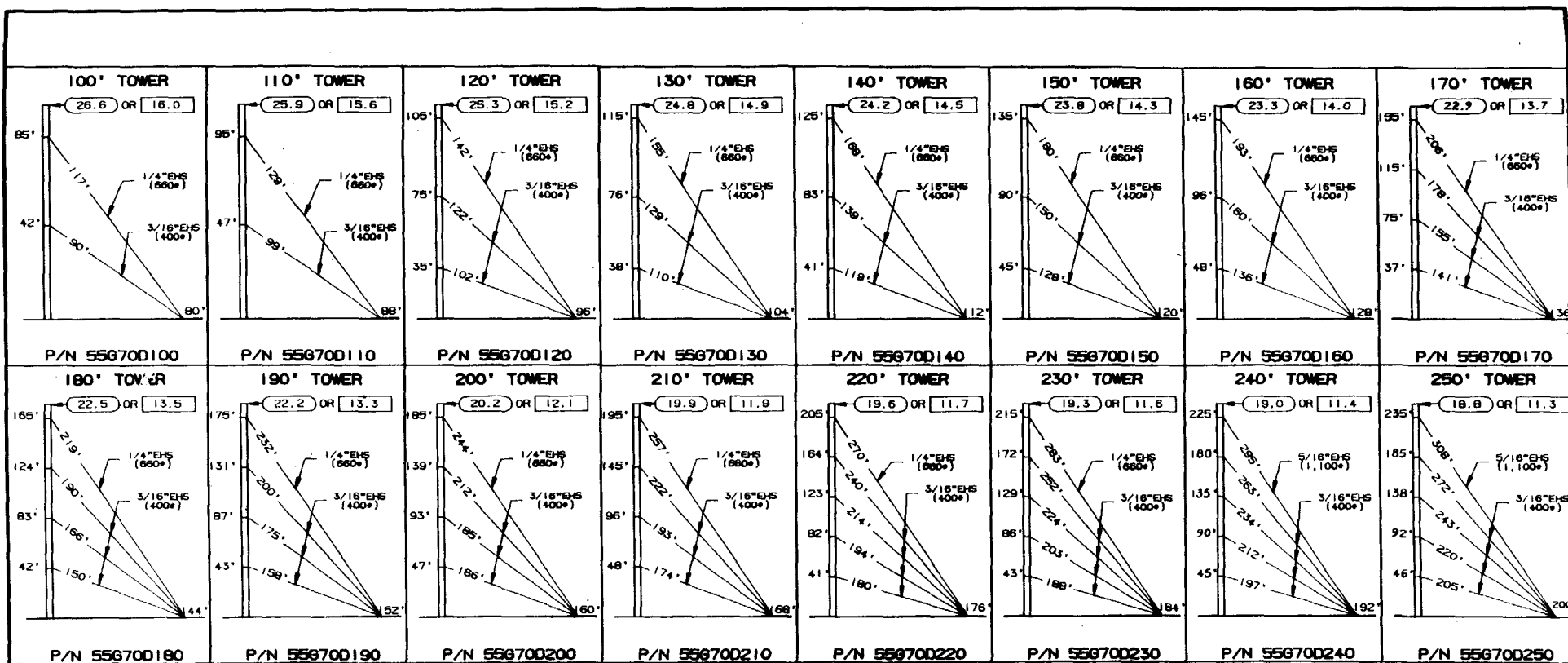


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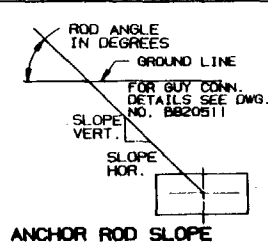
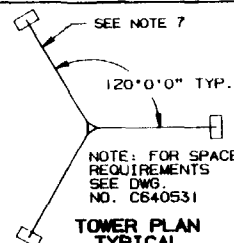
#3





### GENERAL NOTES

1. TOWER DESIGNS ARE IN ACCORDANCE WITH APPROVED NATIONAL STANDARD ANSI/EIA-222-D (NO ICE).
2. ALLOWABLE PROJ. AREA (SQ. FT.) FOR ROUND MEMBER ANTENNAS.
3. ALLOWABLE PROJ. AREA (SQ. FT.) FOR FLAT MEMBER ANTENNAS.
4. EQUIVALENT FLAT-PLATE ANTENNA AREAS, BASED ON EIA RS-222-C, MUST NOT EXCEED THE AREAS SHOWN FOR FLAT MEMBER ANTENNAS.
5. TOWER DESIGNS INCLUDE THREE SIDE ARMS, SYMMETRICALLY PLACED, HAVING A TOTAL EFFECTIVE PROJECTED AREA EQUAL TO 8.0 SQUARE FEET. FOR SIDE ARM DETAILS (P/N 54253UA). SEE DWG. C821062 LATEST REVISION.
6. DESIGNS ASSUME TWO 7/8" DIA. LINES ON EACH TOWER FACE. TOWER DESIGNS, 200 FEET AND OVER, INCLUDE 2.0 SQUARE FEET OF EFFECTIVE PROJECTED AREA FOR A BEACON (DEDUCT ONE 7/8" LINE FOR BEACON).
7. ANCHOR RADIUS IS FROM TOWER BASE TO INTERSECTION OF ROD WITH GROUND.
8. TOWER DESIGNS AND GUY CHORD LENGTHS SHOWN ARE BASED ON LEVEL GROUND. ADD 6 PERCENT TO CHORD LENGTHS (FOR SAG AND CONNECTIONS) FOR FINAL CUT LENGTHS. ( ) INDICATES INITIAL TENSION FOR GUY WIRES IN POUNDS AT 60 DEGREES FAHRENHEIT.
9. DO NOT INSTALL OR DISMANTLE TOWERS WITHIN FALLING DISTANCE OF ELECTRICAL AND/OR TELEPHONE LINES.
10. TOWER ERECTION AND DISMANTLING MUST BE BY QUALIFIED AND EXPERIENCED PERSONNEL.
11. TEMPORARY STEEL GUYS, WHEN REQUIRED DURING ERECTION OR DISMANTLING, MUST BE SUPPLIED AND INSTALLED BY THE ERECTOR.
12. INSTALL WARNING PLATE (P/N ACIS) IN A HIGHLY VISIBLE LOCATION.
13. ALL ANTENNA INSTALLATIONS MUST BE GROUNDED IN ACCORDANCE WITH LOCAL AND NATIONAL CODES.
14. EXTRA CABLE CLAMPS HAVE BEEN PROVIDED FOR TURNBUCKLE SAFETY REQUIREMENTS. FOR DETAILS SEE DWG. 0680324 LATEST REVISION.
15. FOR GUY HARDWARE INSTALLATION DETAILS SEE DWG. A071382.



TOWER HT.	BASE PIER		ANCHOR DATA					
	REF. DWG. C810621		REF. DWG. 1 BLOCK-C820643; ROD-C860415					
	NO.	REAC. LBS.	BLOCK NO.	ROD NO.	ROD ANGLE	SLOPE HOR. VERT.	REAC. LBS. HOR.	REAC. LBS. VERT.
100'	CB2	6,010	4A	GAC303	42.8	12 11.1	2,410	2,230
110'	CB2	6,280	4A	GAC303	42.9	12 11.2	2,500	2,320
120'	CB2	7,040	4A	GAC303	41.4	12 10.6	2,950	2,600
130'	CB2	7,360	4A	GAC303	41.3	12 10.5	3,080	2,710
140'	CB2	7,660	4A	GAC303	41.2	12 10.5	3,230	2,830
150'	CB2	8,060	4A	GAC303	40.6	12 10.3	3,450	2,950
160'	CB2	8,370	4A	GAC303	40.5	12 10.2	3,580	3,080
170'	CB2	9,110	4A	GAC3455	38.9	12 9.7	4,180	3,380
180'	CB2	9,440	4B	GAC3455	39.2	12 9.8	4,290	3,500
190'	CB2	9,800	4B	GAC3455	39.1	12 9.7	4,490	3,640
200'	CB2	10,180	4B	GAC3455	39.1	12 9.7	4,690	3,810
210'	CB2	10,530	4B	GAC3455	38.9	12 9.7	4,900	3,950
220'	CB2	11,350	4B	GAC3455	38.0	12 9.4	5,520	4,310
230'	CB2	11,680	4C	GAC3455	38.0	12 9.4	5,690	4,440
240'	CB2	12,490	4C	GAC3455	38.5	12 9.5	6,240	4,960
			4D	GAC3455	38.3	12 9.5	6,430	5,080

UNR-Rohn

THIS DRAWING IS THE PROPERTY OF UNR ROHN. IT IS NOT TO BE REPRODUCED, COPIED OR TRACED IN WHOLE OR IN PART WITHOUT WRITTEN CONSENT.

Scale: NONE

Drawn by: GPM/MDU Date: 09-01-87

Checked by: WPT Date: 9/15/87

Approved by Engineering: Rgm Date: 9/30/87

Approved by Production: Date:

Approved by Sales: Date:

Drawing Number: 2-72-88

File Number: C870489

Attachment F



## ROHN COMMERCIAL PRODUCTS DEALER PRICE LIST

SELF-SUPPORTING TOWERS

TOWER HEIGHT	PART NUMBER	DEALER PRICE	WT.	PART NUMBER	DEALER PRICE	WT.
<u>70 MPH BASIC WIND SPEED - NO ICE</u>				<u>90 MPH BASIC WIND SPEED - NO ICE</u>		
(Drawing No. C870698) (1WB or 2W at Top - ANSI/EIA 222 D, Exp. C)				(Drawing No. C870699) (3WNB or 3WN at Top - ANSI/EIA 222 D, Exp. C)		
40'	SS040D70	\$ 1,672.00	486	SS040D90	\$ 2,472.00	845
50'	SS050D70	2,022.00	549	SS050D90	3,747.00	1357
60'	SS060D70	2,972.00	998	SS060D90	3,897.00	1440
70'	SS070D70	3,322.00	1061	SS070D90	5,155.00	1817
80'	SS080D70	4,397.00	1593	SS080D90	5,305.00	1900
90'	SS090D70	4,747.00	1656	SS090D90	6,555.00	2392
100'	SS100D70	5,805.00	2053	SS100D90	6,705.00	2475
110'	SS110D70	6,155.00	2116	SS110D90	8,055.00	3112
120'	SS120D70	7,205.00	2628	SS120D90	8,205.00	3195
130'	SS130D70	7,555.00	2691	SS130D90	9,855.00	3997
140'	SS140D70	8,705.00	3348	SS140D90	10,005.00	4080
150'	SS150D70	9,055.00	3411	SS150D90	11,855.00	5022
160'	SS160D70	10,405.00	4118	SS160D90	12,005.00	5105
170'	SS170D70	10,755.00	4181	SS170D90	14,605.00	6537
180'	SS180D70	12,305.00	5018	SS180D90	14,755.00	6620
190'	SS190D70	12,655.00	5081	SS190D90	17,605.00	8397
<u>70 MPH BASIC WIND SPEED - NO ICE</u>				<u>80 MPH BASIC WIND SPEED - NO ICE</u>		
(Drawing No. C881239) (1W at Top - ANSI/EIA 222D, Exp. C)				(Drawing No. C881240) (1W at Top - ANSI/EIA 222 D, Exp. C)		
40'	SS040D70EXC	\$ 1,434.00	345	SS040D80EXC	\$ 1,434.00	345
60'	SS060D70EXC	2,122.00	593	SS060D80EXC	2,122.00	593
80'	SS080D70EXC	3,422.00	1105	SS080D80EXC	3,422.00	1105
100'	SS100D70EXC	4,847.00	1700			
120'	SS120D70EXC	6,255.00	2150			
140'	SS140D70EXC	7,655.00	2725			
160'	SS160D70EXC	9,155.00	3445			
180'	SS180D70EXC	10,855.00	4215			

All towers are galvanized after fabrication and designed for the basic wind speeds shown above, no ice. See applicable drawings for allowable antenna loads and appropriate parts lists for items included in the above tower prices.

Local engineers must be consulted to determine adequate base and anchor details and wind loading criteria for all rooftop installations.

Installation information and a safety package (part number ACWS) are also included in tower prices. This package consists of one anti-climb warning sign and two Danger - Watch for Wires labels along with other printed safety information.

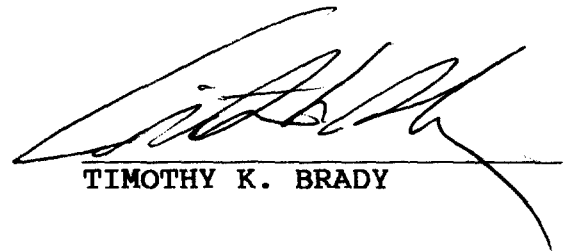
CERTIFICATE OF SERVICE

I, Timothy K. Brady, hereby certify that I have this 9<sup>th</sup> day of September, 1994, served a copy of the foregoing Petition to Reopen the Record and Receive Evidence by First Class mail, postage prepaid upon the following:

Honorable John M. Frysiak  
Administrative Law Judge  
Federal Communications Commission  
2000 L Street, NW, Room 223  
Washington, DC 20554

Robert A. Zuaner, Esq.  
Hearing Branch  
Federal Communications Commission  
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TIMOTHY K. BRADY